## THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, et al.,

Debtors.<sup>1</sup>

In re:

THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE PUERTO RICO ELECTRIC POWER AUTHORITY,

Debtor.

PROMESA Title III

No. 17-BK-3283-LTS

(Jointly Administered)

PROMESA Title III

No. 17-BK-4780-LTS

<sup>&</sup>lt;sup>1</sup> The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17-BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

OBJECTION OF ASSURED GUARANTY CORP. AND ASSURED GUARANTY MUNICIPAL CORP. TO URGENT CONTESTED MOTION OF THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD, AS DEBTOR'S TITLE III REPRESENTATIVE, REQUESTING FURTHER EXTENSION OF FILING DEADLINES FOR SUBMISSION OF (A) PREPA'S PROPOSED AMENDED PLAN OF ADJUSTMENT AND (B) JOINT STATUS REPORT AND PROPOSED CONFIRMATION SCHEDULE(S) (ECF NO. 3887)

To the Honorable United States District Court Judge Laura Taylor Swain:

Assured Guaranty Corp. and Assured Guaranty Municipal Corp. (together, "Assured") hereby submit this Objection (the "Objection") to the *Urgent Contested Motion of the Financial Oversight and Management Board for Puerto Rico, as Debtor's Title III Representative, Requesting Further Extension of Filing Deadlines (a) to August 25, 2023 for Submission of PREPA's Proposed Amended Plan of Adjustment and Related Documents and (b) to August 30, 2023 for Submission of Joint Status Report and Proposed Confirmation Schedules(s)* (the "Urgent Motion," ECF No. 3887)<sup>2</sup>, and respectfully state as follows:

 Assured respectfully submits this Objection to the Urgent Motion and shares in concerns expressed by GoldenTree Asset Management LP in its Objection to the Urgent Motion (ECF No. 3888).

[Remainder of Page Intentionally Omitted]

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<sup>&</sup>lt;sup>2</sup> "<u>ECF No.</u>" refers to documents filed in Case No. 17-04780-LTS, unless otherwise noted.

Dated: August 17, 2023

New York, New York

## CASELLAS ALCOVER & BURGOS P.S.C.

## CADWALADER, WICKERSHAM & TAFT LLP

By: <u>/s/ Heriberto Burgos Pérez</u>

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By: /s/ Howard R. Hawkins, Jr.

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<sup>\*</sup> Admitted pro hac vice

## **CERTIFICATE OF SERVICE**

I hereby certify that I filed this document electronically with the Clerk of the Court using the CM/ECF System, which will send notification of such filing to all parties of record in the captioned case.

At New York, New York, the 17th day of August, 2023.

By: /s/ Howard R. Hawkins, Jr.

Howard R. Hawkins, Jr.\*

\* Admitted pro hac vice